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Attorneys for Merrill Lynch International and  
Certain of its Affiliates

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC.	:	Case No. 08-13555 (JMP)
	:	
	:	(Jointly Administered)
Debtors.	:	

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**NOTICE OF HEARING ON MOTION BY ATTORNEYS FOR MERRILL LYNCH  
INTERNATIONAL AND CERTAIN OF ITS AFFILIATES FOR ENTRY OF AN ORDER  
(A) CONFIRMING ABILITY TO DELIVER NOTICE OF ACCELERATION WITH  
RESPECT TO CERTAIN NOTES ISSUED BY FOREIGN AFFILIATE WITHOUT  
RELIEF FROM THE AUTOMATIC STAY OR (B) GRANTING  
LIMITED RELIEF FROM THE AUTOMATIC STAY TO DELIVER SUCH NOTICE**

**PLEASE TAKE NOTICE** that a hearing on the motion (the “Motion”) of Attorneys for Merrill Lynch International and certain of its affiliates (collectively, “ML”) for entry of an order (a) confirming ML’s ability to deliver one or more notices of acceleration on Lehman Brothers Holdings Inc. with respect to certain notes issued by Lehman Brothers Treasury Co. B.V. without relief from the automatic stay or (b) granting limited relief from the automatic stay to deliver such notices, all as more fully described in the Motion, will be held before the Honorable James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Alexander Hamilton Customs House, Courtroom 601, One

Bowling Green, New York, New York **on December 16, 2009, at 10:00 a.m. (Prevailing Eastern Time)** (the “Hearing”).

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the relief requested in the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) and shall be filed with the Bankruptcy Court in accordance with General Order M-242 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), the official website for the Bankruptcy Court) and, by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), Word, Wordperfect or any other Windows-based word processing format (with a hard-copy delivered directly to Chambers) and shall be served upon (i) the Chambers of the Honorable James M. Peck, One Bowling Green, Courtroom 601, New York, New York 10004, (ii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, NY 10004 (Attn: Andy Velez-Rivera, Esq., Paul Schwartzberg, Esq., Brian Masumoto, Esq., Linda Rifkin, Esq, and Tracy Hope Davis, Esq.), (iii) Skadden, Arps, Slate, Meagher & Flom LLP, 4 Times Square, New York, NY 10036, (Attn: Jay M. Goffman, Esq.), attorneys for ML, (iv) Weil Gotshal & Manges LLP, 767 Fifth Avenue, New York, NY 10153 (Attn: Richard P. Krasnow, Esq., Lori R. Fife, Esq., Shai Y. Waisman, Esq. and Jacqueline Marcus, Esq.), attorneys for the Debtors; (v) Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, NY 10005 (Attn: Dennis F. Dunne, Esq., Dennis O’Donnell, Esq., and Evan Fleck, Esq.), attorneys for the Official Committee of Unsecured Creditors and (vi) Kramer Levin Naftalis & Frankel LLP, 1177 Avenue of the Americas, New York, NY 10036 (Attn: Thomas Moers Mayer, Esq. and Daniel M. Eggermann, Esq.), attorneys for Rutger Schimmelpenninck and Frédéric Verhoeven, Bankruptcy

Trustees (*curators*) of Lehman Brothers Treasury Co. B.V.; so as to be received not later than  
**4:00 p.m. (Prevailing Eastern Time) on December 13, 2009** (the “Objection Deadline”).

**PLEASE TAKE FURTHER NOTICE** that if an objection to the Motion is not received  
by the Objection Deadline, the relief requested shall be deemed unopposed, and the Bankruptcy  
Court may enter an order granting the relief sought without a hearing.

**PLEASE TAKE FURTHER NOTICE** that objecting parties are required to attend the  
Hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: New York, New York  
November 25, 2009

Skadden, Arps, Slate, Meagher & Flom LLP

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